

## **REMARKS/ARGUMENTS**

### **Claim Amendments**

The Applicant has amended claims 1, 2 and 8 and support for the amendments is found on page 5 lines 30 through page 6 line 2. Applicant respectfully submits no new matter has been added. Claims 1-14 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### **Examiner Objections - Claims**

Claim 1 was objected to because of informalities. The Applicant appreciates the Examiner's thorough review of the claims. The Applicant has amended the claim as suggested by the Examiner in order to correct the informalities. The Examiner's consideration of the amended claim is respectfully requested.

### **Claim Rejections – 35 U.S.C. § 102(b)**

Claims 1-3, 6, 8-10 and 13 stand rejected under 35 U.S.C. 102(b) as being anticipated by Lammi et al (WO 01/28273). The Applicants respectfully traverse the rejection of these claims.

A prior art reference anticipates the claimed invention under 35 U.S.C. §102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990)

The Applicant discloses a system and method for protecting the identity of subscribers, both the identity of the requesting subscriber and the identity of the target subscriber. A Subscriber Identity Server (SIS) is utilized to provide aliases to both the requester and the target. Both aliases may be used when determining the location

The Lammi reference discloses a method and system for protecting the user identifier from a service provider (page 4, lines 11-22), in this instance a geographical information service.

A difference between Lammi and Applicant is the Applicant's invention protects the identity of requester who is trying to determine the location of a target subscriber and Lammi is protecting the identity of a user of a service. Lammi protects a subscriber from a content provider and the Applicant protects the identity/integrity of a subscriber seeking the location of another subscriber and the identity of the "another" subscriber.

The Lammi reference lacks at least the limitation of protecting the identity of both the requesting subscriber and the target subscriber as there is no target subscriber disclosed in Lammi. The Applicant respectfully requests the withdrawal of the rejection of claim 1. Also, withdrawal of the rejection of analogous claim 8, which contains similar limitations, and the respective depending claims 3, 6, 9-10 and 13 is also requested.

#### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 4 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lammi et al (WO 01/28273) in view of Olrik et al (US publication number: 2003/0125042). The Applicant respectfully traverses the rejection of these claims.

The Olrik reference is cited for disclosing a positioning request as an SMS message. However, the Olrik reference fails to disclose limitations lacking in Lammi; that of one subscriber requesting the location of another subscriber and the method and system of the Applicant's invention providing an alias for each subscriber. The Applicant respectfully requests the withdrawal of the rejection of claims 4 and 11.

Claims 5 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lammi et al (WO 01/28273) in view of Baba et al (patent number: JPO2003078632). The Applicant respectfully traverses the rejection of these claims.

The Baba reference is cited for disclosing a positioning request as a voice call via a call center (IVR). The Baba reference fails to disclose the limitations missing from the Lammi reference and the combination of the Lammi and Baba reference fails to disclose the limitations of Applicant's claims 1 and 8 from which claims 5 and 12 depend. The Applicant respectfully requests the withdrawal of the rejection of claims 5 and 12.

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lammi et al (WO 01/28273) in view of Kim et al (US publication number: 2002/0083198). The Applicant respectfully traverses the rejection of these claims.

The Kim reference is cited for disclosing an alias identity as an E.164 number. However, Kim fails to provide the limitation of providing an alias to two subscribers; the limitation lacking in the Lammi reference. This being the case, the Applicant respectfully requests the withdrawal of the rejection of claims 7 and 14.

### **Prior Art Not Relied Upon**

In paragraph 12 on page 13 of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicant's disclosure.

**CONCLUSION**

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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